

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

IN RE: SEARCH OF
One U.S. Mail Parcel
Bearing USPS Tracking Number (P)
9505510048735135592331

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Case No. 3:25-sw- 119



AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR ONE SEARCH WARRANT

I. Subject Parcel

1. This is an Affidavit submitted in support of an Application for a Search Warrant for one subject U.S. Mail Parcel (hereinafter, the "Subject Parcel"). The Subject Parcel is currently located in Richmond, Virginia, which is within the Eastern District of Virginia. The Subject Parcel is specifically identified as follows:

<i>Subject Parcel</i>	<i>Priority Mail Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1	(P) 9505510048735135592331	2180 E. Warren Springs Las Vegas, NV 89119	Cameryn Morie 2331 Elkview Drive N. Chesterfield, VA 23236

II. Affiant

I, Steven A. Scully, being duly sworn, hereby depose and state:

2. I am a Special Agent with United States Postal Service, Office of Inspector General (USPS OIG), currently assigned to the Drug Enforcement Administration (DEA) and have been a Federal Agent since June 2012. Upon becoming a Special Agent I completed twelve

weeks of training at the Federal Law Enforcement Training Center in Glynco, Georgia. The training covered various aspects of federal law enforcement including the investigation of narcotics-related offenses. I have received instruction on conducting investigations and participated in investigations involving possession with intent to distribute and distribution of controlled substances. I have participated in multiple interdictions, controlled deliveries, seizures, and search warrants, which have resulted in criminal arrests and prosecutions. I have participated in the application for and execution of multiple arrest and search warrants in the investigation of several narcotics and organized crime-related offenses resulting in the prosecution and conviction of individuals and the seizure of illegal drugs, weapons, stolen property, United States currency, and other evidence of criminal activity. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of controlled dangerous substances. I have become familiar with the manner in which individuals and groups organize to conduct their operations, as well as means generally employed to avoid detection by law enforcement. At my current assignment with the DEA, I am involved in investigations that focus on an illegal drug trafficking organization operating in the metro-Richmond area.

3. The facts and information contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by the persons who made the observations. Sources of information used routinely in this process also include verifying zip codes through a public database maintained by the U.S. Postal Service (*USPS.com*) and checking associations between names and addresses in a law enforcement database named CLEAR. This affidavit

contains only that information necessary to establish probable cause in support of an application for a search warrant for one U.S. Mail Parcel, hereinafter “the Subject Parcel.” This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

4. Based on my training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics and controlled substances. In addition to the drugs themselves, the packages often contain other evidence of drug-related crime, including U.S. Currency, consumer and financial records related to the sale of drugs, notations or instructions relating to the drugs or payments for the drugs, drug paraphernalia, and fake prescriptions. Based on my training and experience, I know mail is often used for transportation of large amounts of currency which further the drug trafficking scheme. Frequently, packages of this kind contain only currency. This is because the trafficker eschews using formal banking practices to avoid detection of the amounts of currency used to further the drug trafficking scheme. These factors, detailed more fully below, are used as a pointer system to identify packages requiring further investigation.

A. Priority Mail Express and Priority Mail. Contrasts observed between legitimate business parcels and drug parcels with regard to the use of Priority Mail Express and Priority Mail:

- i. *Priority Mail Express:* As alternatives to First Class Mail, the U.S. Postal Service offers Priority Mail Express and Priority Mail. Priority Mail Express is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time

of mailing.) The customer receives a receipt with this guaranteed information and can opt for a signature requirement at the other end or not. Customers can track the parcel online by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail.

- ii. *Priority Mail:* Priority Mail has a delivery service standard of two to four business days, but is not guaranteed. Priority is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel.
- iii. Legitimate businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing, in contrast to the drug distributor who will pay at the counter with cash or a credit card. Business Priority Mail Express parcels typically weigh no more than eight ounces, and business Priority Mail parcels typically weigh no more than two pounds. Drug packages typically exceed these weights. In my experience, it is fairly easy to separate out smaller parcels, which constitute seventy to eighty percent of all Priority Mail Express and Priority Mail parcels, from other parcels. Address labels on business parcels are typically typed, and address labels on drug packages are typically hand written. Typically, drug traffickers using Priority Mail

Express will opt out of the signature requirement.

B. Invalid Sender/Return Address. When drugs are shipped through the mails, the senders generally do not want them back. To distance themselves from parcels containing drugs, the return addresses and the names of senders are often fictitious or false. A fictitious or false address can be anything from an incorrect zip code to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. I have seen packages sent by persons with names of celebrities, cartoon characters, or fictional persona. More often a search of the CLEAR database reflects that there is no association between the name of the sender and the address provided.

C. Invalid Recipient/Address. It may appear counterintuitive and counterproductive to put the wrong receiving address on a package, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the package as to their knowledge of its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

D. Additional Indicators. Other factors indicative of drug trafficking that are seen less frequently, but nevertheless noteworthy include:

- i. *Smell:* The odors of cocaine, marijuana, and methamphetamine are distinct, and, through experience, postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is

easily recognized without the assistance of a canine. Other smells that suggest the contents are narcotics are from masking agents. Common masking agents used in an attempt to thwart law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

- ii. *Heavy Packaging*: Heavily taped parcels are another factor that will suggest a drug parcel. Your affiant has also observed excessive glue on package flaps.

5. It is my experience that when these factors are observed, the alert of a trained canine on the package will follow. As a result, these factors become a reliable way to profile the parcels being shipped every day.

III. Statement of Facts and Circumstances

6. On May 15, 2025, the following factors or suspicious characteristics are present in the Subject Parcel:

Subject Parcel: Priority Mail Express/Priority/ Registered/1st Class	Weight of Parcel	FROM Invalid name/address	Other Suspicious Characteristics
Priority 12.5" x 9.5"	.44 lbs	2180 E. Warren Springs Las Vegas, NV 89119 No name listed for the sender	Resident of the house stated "Cameryn Morie" is her stage name and that illegal narcotics were inside the parcel
Source Area	Label	TO/Invalid name/address	Canine Alert

Yes-Nevada	Handwritten	“Cameryn Morie” 2331 Elkview Dr. N. Chesterfield, VA 23236 Name associated with address	YES- “NALA”
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7. On May 13, 2025, USPS OIG was notified by local law enforcement that the residents at 2331 Elkview Dr., N. Chesterfield, VA 23236 (Subject Residence) were receiving illegal narcotics to the residence via the U.S. Postal Service. USPS OIG, placed an alert to identify any parcels inbound to the Subject Residence.

8. On May 15, 2025, law enforcement intercepted the USPS Express Parcel x4879US at the USPS Regional Processing and Distribution Center (RPDC) and contacted Department of Juvenile Justice Lieutenant (Lt.) Robin S. Robinson and her narcotics detecting canine to conduct an examination of the parcel. On May 15, 2025, Lt. Robinson’s narcotics detecting canine, “NALA,” positively alerted to the odor of narcotics within Express Parcel x4879US. A search warrant was applied for and granted by Honorable Judge S. Speight, 3:25-sw-115. Law enforcement opened the parcel and identified three small baggies that contained various colors of powder. The contents of one of the baggies field tested positive for Methylenedioxymethamphetamine (MDMA).

9. On May 16, 2025, a controlled delivery was conducted with Express Parcel x4879US to the Subject Residence. Express Parcel x4879US was retrieved by an occupant of the Subject Residence and brought inside the Subject Residence. A state of Virginia search warrant was executed on the Subject Residence. While conducting the search of the Subject Residence,

USPS OIG, via an e-mail alert, identified the Subject Parcel being inbound to the Subject Residence. The affiant asked one of the owners of the residence, Tiffany Hagen, if she recognized the name listed on the Subject Parcel. Hagen stated that “Cameryn Morie” was her stage name and that illegal narcotics were inside the parcel.

10. On May 17, 2025, law enforcement seized the Subject Parcel and placed it into temporary storage at Chesterfield County Police Department Evidence facility. On May 19, 2025, the Subject Parcel was placed in a row with 5 empty Federal Express envelopes in the garage of the Drug Enforcement Administration in Richmond, Virginia. At that time, Lt. Robinson and her canine “NALA” were brought in to search the area. Lt. Robinson is employed by the Department of Juvenile Justice since February 2024 and prior to that Lt. Robinson was a Police Officer with the Richmond Police Department since July 1994. Lt. Robinson has been a canine handler since 1998 and is specifically trained to interpret the reactions of canine “NALA” in detecting the odor of a controlled substance. Officer Robinson observed canine “NALA” and then informed USPS OIG that “NALA” demonstrated a positive alert on the Subject Parcel.

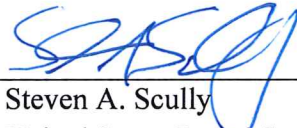
IV. Reliability of the Narcotic Detector Canine

11. Lt. Robinson advised this affiant that she and canine “NALA” were trained by the Richmond Police Department Canine Unit. Lt. Robinson and canine “NALA” were certified as a team after a 14 week Canine/Handler course in July 19, 2021 under the certification guidelines set forth by the Virginia Police Work Dog Association. Canine “NALA’s” certification was conducted by a Master Trainer from the Virginia Police Work Dog Association in a “single blind” method (where the results are unknown to the handler). Single blind certification ensures that the handler cannot cue the dog, as the handler does not know the results. Canine “NALA”

responds by freezing at source after the alert has been given. This indicates to Lt. Robinson the odor of marijuana, cocaine, heroin, ecstasy, and methamphetamine has been detected. Canine "NALA" receives monthly re-training of three eight (8) hour days each month and daily training exercises. Virginia Police Work Dog Association requires annual re-certification and Canine "NALA" and Lt. Robinson re-certified on May 14, 2025.

V. Conclusion

12. I submit that based upon the above indicators exhibited by the Subject Parcel, my training and experience, and the alert of a trained canine on the package, that there is probable cause to believe that the above-described Subject Parcel contains narcotics or controlled substances and/or materials or proceeds relating to violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Use of a Communication Facility in the Commission of a Federal Drug Felony).



Steven A. Scully
United States Postal Service
Office of Inspector General

Subscribed and sworn before me on this 27th day of May 2025 at Richmond, Virginia.



Hon. Mark R. Colombell
United States Magistrate Judge